

United States Government

Department of Energy

# memorandum

DATE: APR 27 1992

REPLY TO EM-453 (A. Rampertaap, 3-8191)  
ATTN OF:

SUBJECT: Comments on Rocky Flats Draft Final No Further Action Justification  
Document for Operable Unit 16

TO: Frazer Lockhart, RF

The Office of Southwestern Area Programs, Rocky Flats/Albuquerque Production Division (EM-453), has reviewed the above-referenced document and is providing the attached comments. Please address these comments before the document is finalized.

We are concerned that the document does not appear to adequately demonstrate that the Solid Waste Management Units (SWMUs) do not pose a threat to the environment. A valid justification for No Further Action (NFA) is not presented for most SWMUs. The document would also benefit from a structure that identified and described the criteria used to support a NFA justification for each low priority site. According to the Environmental Protection Agency regulations, a SWMU can be recommended for NFA if it can be demonstrated that the SWMU poses no threat to human health or the environment. For the Individual Hazardous Substance Sites in Operable Unit 16, such a recommendation cannot be considered until the potential threat posed by suspected contaminants of concern has been assessed. A field investigation or thorough review of archival information is needed to assess the threat. The information obtained from these investigations and reviews should then be compared to the NFA evaluation criteria to support the proposed recommendation.

We are also concerned about the use of former reports in this document. The reports in question appear to be in conflict with one another. Two of the reports are pre-Interagency Agreement (IAG) and appear not to take IAG concerns into consideration. If these reports are to be used, it is recommended that they be included as a reference in an appendix.

Please call me at 301-903-8191 if you have any questions related to this request.

*Autar Rampertaap*

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Rocky Flats/Albuquerque Production Division  
Office of Southwestern Area Programs  
Environmental Restoration

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE

Attachment

cc w/attachment:  
B. Magee, HAZWRAP

cc w/o attachment:  
R. Greenberg, EM-453  
J. Hartman, RF

ADMIN RECCRD  
SW-A-003500

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EM-453 COMMENTS ON  
DRAFT FINAL NO FURTHER ACTION  
JUSTIFICATION DOCUMENT, OPERABLE UNIT 16  
ROCKY FLATS PLANT, GOLDEN, COLORADO  
APRIL, 1992

**CRITICAL COMMENTS:**

1. This document does not appear to adequately demonstrate that the Solid Waste Management Units (SWMUs) do not pose a threat to the environment. A valid justification for No Further Action (NFA) is not presented for most SWMUs. This document would also benefit from a structure that identified and described the criteria used to support a NFA justification for each low priority site. According to proposed Subpart S, a Solid Waste Management Unit (SWMU) can be recommended for NFA if it can be demonstrated that the SWMU poses no threat to human health or the environment (Environmental Protection Agency 1990, 0432). For the Individual Hazardous Substance Sites (IHSSs) in OU16, such a recommendation cannot be considered until the potential threat posed by suspected contaminants of concern (COCs) has been assessed. A field investigation or a thorough review of archival information is needed to assess the threat. The information obtained from these investigations and reviews should then be compared to the NFA evaluation criteria to support the proposed recommendation.

This document would benefit from consolidating information from each IHSS, rather than segregating the information based upon source. Also, define the acronym IHSS.

2. This document should not be identified as a Draft Final version. It contains excerpts which are not presented in a format that allows easy reviews and conclusions. Additionally, the same reports appear to be in conflict with each other. It is suggested that these be used as a reference in an appendix. Two of the reports (June 1, 1988 and April 1986) are pre-interagency agreement (IAG) and appear not to take into consideration items that are a concern in the IAG.

**GENERAL COMMENTS:**

1. The statement that "The IHSS is being studied in accordance with the IAG schedule for Operable Unit 16 (OU16). The Final No Further Action Justification Documentation (NFAJD) for OU16 is to be completed by July 30, 1992." appears in several pages of the 12-26-91 report. This appears to be in conflict with this document, since no other studies are presented.
2. The Proposed Action for IHSSs 194 and 195 is to include these locations in another Operable Unit that will be investigated. These recommendations imply that RFI/RI will not be performed on OU16. If this is the situation, it is recommended that it be presented in the introduction of this document.
3. The sitewide environmental surveillance report prepared annually for DOE represents a source of information on contamination that could be used to support the NFA process. It is recommended that this and other sources of environmental data be incorporated into this document.
4. This document contains discrepancies between the information presented in the Comprehensive Environmental Assessment and Response Program (CEARP), Remedial Investigation and Feasibility Study Plan, and the Proposed Actions. These inconsistencies in reported volumes of spills and other evaluation parameters should be reconciled in the next draft.
5. The information presented in this report does not indicate that specific remedial actions are being considered for these low priority sites. The *Rocky Flats Plant Environmental Restoration EM-40 Baseline (January 31, 1992)* document indicates that 130 yd<sup>3</sup> of soil are assumed to require remediation from an area approximately 32' x 32' x 6". The location of this area should be indicated in the NFA to be consistent with other RFP documents.
6. The title page indicates that this document is Volume I. The text does not indicate that more volumes are under consideration or included in this NFA justification process. If other volumes are planned or anticipated, it would be appropriate to recognize this aspect in the first volume.
7. References identified in the PAC Reference Number descriptions should be completely described in this document, rather than by a seven digit number. Also, define the acronym PAC.
8. This document would benefit from use of index and page numbers.

# **SPECIFIC COMMENTS:**

1. Section 1.0, para 1: A brief history of the site and OU16 should be provided to give the reviewer orientation on the background of this document.

Define the acronym IHSS.

2. Section 2.0, para. 1: Historical information should be summarized and discussed in this section. The three reports should be composed into one description.
3. Section 2.0, p. 000-49, Responses to Operation or Occurrence Para.: Follow-up samples are discussed. What was analyzed? What were the findings? What was sampled? What did the results indicate? What was the conclusion of the Utilities personnel report? The RI/FS description indicates that infiltration into the colluvium aquifer is certain. This point was not addressed in the PAC description or in the Proposed Action.

Provide adequate site characterization information to justify no further action. If the antifreeze solution was used in the system, Toxic Characteristic Leaching Procedure (TCLP) metals may be a concern, if not, it would be appropriate to contradict the RI/FS assertion.

Define the acronym HRR.

4. Section 2.0, p. NW-17, Responses to Operation at Occurrence Para.: The unconfirmed sample of 10 parts per million should be verified since there is a significant difference between air and soil samples. Since nickel carbonyl is heavier than air, would a sample taken at the "lip of the well" be adequate to characterize the site? Conflicting documentation exists on whether or not the two cylinders were empty when buried (June 1988). Since TCLP nickel could be a hazardous waste, and the exact locations of the cylinders and sites are unknown, describe why this SWMU does not require further action, if it is to be included in existing OU. A RFI/RI may be required if contamination by nickel carbonyl is found.
5. Section 2.0 p. 400-32, Amines were identified as the principal contaminant released from a leaking condensate line. The text does not define the status of the amines. If the amines are not hazardous or toxic, it would be appropriate to indicate this in the text.
6. Section 2.0 p. 500-17, The RI/FS description identifies the presence of monitoring wells in the vicinity of Building 559. The PAC description does not mention these wells. If these or other wells are currently monitoring ground water in the vicinity of the scrap metal site, it is recommended that their data be incorporated into this document to support the Proposed Action.

7. Section 2.0, p. 700-64, PAC description indicates TCE leaked onto the ground, RI/FS described the area as paved. This Proposed Action used the PAC description. It is not clear how this difference was resolved in the Proposed Action to conclude that the area was paved. If the area was unpaved at the time of the spill, the Proposed Action might recommend a different action.
8. Section 2.0 p. 700-65, The Proposed Action indicates that further investigation is required and recommends incorporating this IHSS into an OU that is undergoing or will undergo an RFI/RI. This recommendation implies that an RFI/RI cannot be reformed on OU16, which is an incorrect assertion. It is recommended that the Proposed Action recognize that an RFI/RI may be required for OU16.
9. Section 3.32.1, and 3.32.3, para 1: Clarification is needed to determine whether the spill occurred onto the loading dock, the ground, or both. The aforementioned sections describe the spill as leaking onto a loading dock. The report dated 12/26/91 (p.700-64) describes the spill as leaking onto the ground. Where the spill occurred determines what sort of clean-up measure is utilized. Based on the description of the loading dock, it is assumed to be an asphalt type. This type of material absorbs liquid such as 1,1,1-trichloroethane.  
  
Oil Dry would not remove all the contaminant. As a result, residual contamination can occur as runoff. Was any documented sampling or on-site monitoring performed to verify the status of the site? What evidence is provided to justify no further action. One approach could be to claim the release as de minimis to basic operations.
10. Section 3.38.1, para. 2: Ethylene glycol is considered toxic and has a low volatility. (Casarett and Doull's Toxicology, 1986, p.654). This implies that the material does not easily degrade in the environment as claimed. Provide documentation that demonstrates this claim. Also, define the acronym FFSDIF.
11. Section 3.39.4, para. 1: Justify why the amines would no longer be detectible. This can be demonstrated by documented research on the contaminant or actual sampling. This statement is in conflict with the Fate of Constituents Released to the environment section on page 400-32.
12. Section 3.40.1, and 3.40.3, para. 1: The description of the problem fails to mention that the water contains tritium. The 12/26/91 report (page 700-65) mentions that samples exceeded 1163 pCi/l in Walnut Creek. Even given the fact that the tritium has undergone one half-life, contamination still exists. It is incorrect to state that no environmental hazard exists due to the tritium.
13. Section 3.41.1, para. 1: The statement that the cylinders are presumably empty leads one to believe that there are unknowns on the site. This type of uncertainty makes a weak argument for the no

further action recommendation without further sampling.

14. Section 3.42.3, para. 3: Although the information presented is probably true, the argument appears weak from a regulatory standpoint to justify no further action. A detailed listing of constituents from other backwash waters (either from a literature review or analysis of other on-site backwash) could strengthen the justification.
15. Section 3.43.2, para. 2: Two monitoring wells are discussed but no additional information is presented. Are the wells down-gradient? What sampling data is available? Have additional wells been installed in the past 4 years? Also, the 12/26/91 report (p. 500-15) cast doubts on the location of this site. Provide this information.
16. Section V.A.4, p. V-44 to V-47: The descriptions are difficult to correlate to the other reports. Provide a means of using the SWMUs or IHSS numbers for consistency.
17. Section 3.0, IHSS 193, para. 1: The proposed action is to remove this site from further action. This statement contradicts 12/26/91 report (pg. 400-32) Fate of Constituents Released to Environment Section. Revise accordingly.
18. Section 3.0, IHSS 194, para. 1: The sampling recommendation contradicts the June 1, 1988, report Section 3.40.4. Revise for clarity.
19. Section 3.0, IHSS 195, para. 1: The sampling recommendation contradicts the June 1, 1988, report Section 3.41.4. Revise for clarity.
20. Map on last page: The map is assumed to be relevant. No references are made to it but it is assumed to show the Rocky Flats Plant with the hand-drawn shaded areas being the appropriate SWMUs. Please clarify if this was the intent of the map.